

WATT, TIEDER, HOFFAR
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March 4, 2003

VIA FEDERAL EXPRESS

The Honorable Catherine C. Blake
United States District Court
For the District of Maryland
Garmatz Courthouse
101 W. Lombard Street
Baltimore, MD 21201

Re: CCB 02 CV 1271

Dear Judge Blake:

Enclosed please find a courtesy copy of the Motion regarding the February 11, 2003 Order, enforceable March 5, 2003.

Very truly yours,

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.



Justin S. Hawkins

JSH/sp
Enclosure

cc: Price O. Gielen, Esq. (with enc.; via facsimile)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)

ANTWERPEN CHEVROLET, LTD., et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. CCB02CV1271
	:	
RESOLUTION PROVIDERS, INC., et al.,	:	
	:	
Defendants.	:	

MOTION FOR EXTENSION OF THE DATE OF ENFORCEMENT OF ORDER

COME NOW the defendant, Resolution Providers, Inc. ("RPI"), Watt, Tieder, Hoffar & Fitzgerald, L.L.P. ("WTHF") and the individual counsel of record for defendant, and pursuant to Local Rule 105.9, hereby request an extension of the date of enforcement of the Magistrate Judge's February 11, 2003 Order of further discovery and award of expenses (the "Order") and would state as follows:

1. On February 11, 2003 U.S. Magistrate Justice Guavey ordered RPI to submit affidavits regarding its attempts to locate requested documents and to supplement its Answers to Interrogatories by March 5, 2003. RPI, WTHF, and the individual counsel of record were also held to be joint and severally required to pay \$1,500.00 in expenses to the Plaintiffs by March 5, 2003.

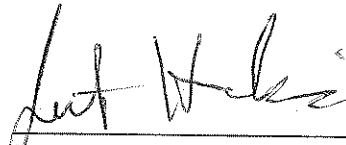
2. Pursuant to the Order, on February 21, 2003, WTHF and the individual attorneys of record filed their Rule 37(a)(4)(A) Response to Award of Expenses ("Response"). The Magistrate's consideration of the Response remains pending.

3. On March 3, 2003, RPI, WTHF and the individual attorneys of record timely filed objections to the Order ("Objections"), and respectfully request that this Court

extend the date for enforcement of the obligations imposed by the Order, pending consideration of the objections.

4. Pursuant to Local Rule 105.9, the undersigned conferred with counsel for Plaintiffs regarding the extension and notified counsel of its intent to file this Motion. At the time of this filing, it is undetermined whether counsel for Plaintiffs will provide consent to the extension

Respectfully submitted this 4th day of March 2003.



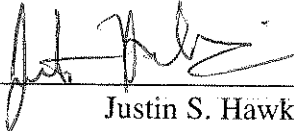
J. Brian Cashmere, Esquire
Federal Bar No. 14170
Kathleen Olden Barnes, Esquire
Justin S. Hawkins, Esquire
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FITZGERALD, L.L.P.
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Office: 703-749-1000
Fax: 703-893-8029

Counsel for Defendant,
Resolution Providers, Inc.

Certificate of Service

I hereby certify that on March 4, 2003, I caused a true copy of the foregoing Motion for Extension of Date to Enforce Order to be delivered via facsimile and First Class U.S. mail to:

Price O. Gielen, Esquire
Neuberger, Quinn, Gielen, Rubin & Gibber, P.A.
27th Floor
One South Street
Baltimore, MD 21202


Justin S. Hawkins

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FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)

ANTWERPEN CHEVROLET, LTD., et al.,

Plaintiffs,

v.

RESOLUTION PROVIDERS, INC., et al.,

Defendants.

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:
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Civil Action No. CCB02CV1271

ORDER

On this ____ day of March 2003, Resolution Providers, Inc, Watt, Tieder, Hofffar & Fitzgerald, L.L.P., and the attorneys of record's Motion for Extension of the Date of Enforcement of Order is hereby GRANTED.

CATHERINE C. BLAKE
United States District Court Judge